

## **Notice of Procedural Change**

### **Effective Date: November 13, 2006.**

In order to more quickly alert you to issues relating to your submissions, the Alcohol & Tobacco Tax & Trade Bureau's (TTB) Nonbeverage Products Laboratory (NPL) is implementing a change in procedure relating to the processing of TTB Form 5154.1 – “Formula and Process for Nonbeverage Product.” Under the new procedure, the NPL will identify errors and ambiguous information contained in the formula and return the form to you for correction. The NPL will no longer make corrections to the form. Currently, NPL chemists spend a great deal of time correcting errors on submissions which takes time away from processing those formulas that were submitted without error. With the new system, NPL chemists will devote the majority of their time on quickly processing those formulas that contain all of the required information and are without mistakes. Please visit the NPL’s [Drawback Tutorial](#) for extensive guidance for completing an error-free TTB Form 5154.1.

**Your formula will be returned for any of the following reasons:**

- A sample is needed.

[NOTE: DOMESTICALLY PRODUCED PRODUCTS WHICH MEET THE [GUIDELINES](#) POSTED ON THE [DRAWBACK TUTORIAL](#) DO NOT REQUIRE SAMPLE SUBMISSION. PLEASE SEE THE SECTION ENTITLED "[SUBMITTING SAMPLES WITH TTB FORM 5154.1](#)" FOR MORE INFORMATION CONCERNING SAMPLE SUBMISSIONS.]

- The alcohol content by analysis is inconsistent with what is stated on the formula.
- Errors in the formula submission, including, but not limited to:

1. Incorrect name given to product.
2. Flavor chemicals not clearly identified as either natural or artificial.
3. Weight equivalent for all materials is not provided.
4. The predominant ingredient in a chemical grouping has not been disclosed and quantified by weight.
5. Flavor chemicals are grouped in excessively large quantities.
6. Flavor chemicals are grouped incorrectly.
7. Volume equivalent for ingredients containing alcohol is not provided.
8. Alcohol content of components containing alcohol is not provide or is listed incorrectly.
9. Item 9 and/or Item 10 appear to be incorrect.
10. The range for Item 10 is not provided or appears to be incorrect.
11. Information in Item 12 is inconsistent with information in Item 13.
12. Yield information for the finished product by weight and volume is not provided.
13. Sub-formula / intermediate has not been submitted or it has been returned.
14. The botanical source of natural vanillin has not been declared.
15. Limited ingredients are grouped with other flavor chemicals, not disclosed, or weights are missing.

- In addition to minimizing errors and ambiguity, customers can ease the burden on the NPL if they list:
  - A. The component making the product unfit for beverage purposes. Please specifically reference the [guideline](#) as listed in the Drawback Tutorial.
  - B. Internal customer taste panel information as outlined on the Drawback Tutorial. Please see the section entitled "[MNBP Protocol for Organoleptic Analysis](#)."